

(10)

05/21/97 03:00 PM

To: rwoodard@water.ca.gov @ IN
 cc: jkelly@water.ca.gov @ IN, Karen Schwinn, Tom Hagler, Maria Rea
 Subject: EPA Comments on Draft #3 of San Joaquin River Water Quality Problems

Rick:

Unfortunately we didn't have sufficient time at the PCT meeting on 5/14 to discuss the Draft paper titled "CALFED Bay-Delta Program Role and Policy with Respect to San Joaquin River Water Quality Problems" dated May 6, 1997. I am assuming that this paper will be on the agenda for the 6/11 PCT meeting.

In the meantime, I wanted to convey to you EPA's comments on this revised draft paper. I am faxing to you a marked up version of the draft paper reflecting EPA's comments. The bulk of our comments are self-explanatory and relatively minor. However, there are a few items that merit highlighting here and, perhaps, future discussion.

INI MARK
UP POCK

- In the current draft of the paper, it states that "...CALFED will encourage consideration of various mechanisms for removing salts from the Valley..." (page 3, sixth bullet). The phrase "removing salts from the Valley" should be deleted. EPA cannot support the exportation of salt loads from the San Joaquin Valley to another geographic area. CALFED should support and promote in-valley solutions that will reduce salt loads and not just transfer these wastes elsewhere. In fact, the promotion of out-of-valley disposal is inconsistent with CALFED's solution principles (specifically the principal that states "...solutions will not solve problems in the Bay-Delta system by redirecting significant negative impacts...within the Bay-Delta or to other regions of California").
- The language in the first paragraph on page 3 describing Regional Board activities should be checked by Board staff to ensure its accuracy.
- Finally, bullets 4 and 5 on page should reference the Grasslands Bypass Use Agreement and Oversight Committee, respectively.

In general, I think you have done a good job of trying to incorporate our comments and I appreciate your efforts to do so. However, I think we've reached the point where there are some key issues (and perhaps conflicts in agency policies and programs) that need to be identified and discussed by the CALFED agencies.

As always, we appreciate the opportunity to comment on this draft. I would like to discuss this paper and our comments with you before the June PCT meeting. I will, however, be out of the office until June 9th; I will try to reach you then.

Gail

OPTIONAL FORM 98 (7-90)

FAX TRANSMITTAL

of pages **7**

To	Rick Woodard	From	GAIL LOUIS
Dept./Agency	CALFED	Phone	415-244-2019
Fax	(415) 492-7522	Fax #	415-244-1078
NSN 7540-01-217-7300		5090-101 GENERAL SERVICES ADMINISTRATION	

D - 0 4 3 4 8 0

D-043480